

## **REMARKS**

Claims 1-54 were presented for examination and were pending in this application. In an Official Action dated October 4, 2006, claims 1-54 were rejected. Applicants thank the Examiner for examination of the claims pending in this application and addresses the Examiner's comments below. Based on the above Amendment and the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections, and withdraw them.

### **Response to Rejection Under 35 USC § 112, Paragraph 1**

In the paragraphs 3 and 4 of the Office Action, the Examiner has rejected claims 1-54 as allegedly lacking enablement and written description. This rejection is respectfully traversed.

Applicants direct the Examiner's attention to paragraph [0055] of the specification, which indicates that Example 2 (i.e., paragraphs [0134]-[0149]) shows a concrete example of the stated synchronization and coordination of transaction boundaries. In addition, Applicants direct the Examiner's attention to paragraphs [0128]-[0129], which indicates that "*The joiner synchronizes the transactions coming into its two input streams based on the transaction boundaries...*" (emphasis added).

Thus, Applicants submit that synchronization of transaction boundaries is described in the specification so as to reasonably convey the Applicants' possession of the invention at the time of application filing and so as to enable one of skill in the art to make and/or use the invention.

### **Response to Rejection Under 35 USC § 112, Paragraph 2**

In the 5<sup>th</sup> paragraph of the Office Action, the Examiner has rejected claims 1, 7-8, 12, 18-19, 26, 32-33, 37, 43-44, and 51-54 as allegedly not specifically pointing out and distinctly claiming the subject matter that the Applicants regard as the invention.

These claims have been amended to address these rejections, and Applicants submit that the claimed invention is claimed with sufficient particularity to be patentable.

### **Response to Rejection Under 35 USC 103(a)**

In the 6<sup>th</sup> and 7th paragraph of the Office Action, the Examiner rejects claims 1-7, 11-18, 22-32, 36-43, and 47-54 under 35 USC § 103(a) as allegedly being unpatentable in view over U.S. Patent 6,397,223 (“Kori”) in view of U.S. Publication No. 2004/0010538 (“Miller”), and rejects claims 8-10, 19-21, 33-35, and 44-46 as being unpatentable over Kori in view of Miller, and further in view of U.S. Patent 6,230,151 (“Agrawal”). These rejections are respectfully traversed.

Claims 1, 26, and 53 respectively recite a method, system, and computer program product for processing a plurality of data records, comprising:

- setting transaction boundaries among said plurality of data records thereby dividing the plurality of data records into one or more data sets;
- processing via a database transformation each of the one or more data sets thereby producing a multiplicity of results from the one or more data sets; and
- completing the processing of the plurality of data records by synchronizing the transaction boundaries and combining said multiplicity of results.

Claims 12, 37, and 54 respectively recite a method, system, and computer program product for performing a series of transformations on a plurality of data records, comprising:

- setting transaction boundaries among said plurality of data records at said source thereby dividing the plurality of data records into one or more data sets;
- propagating the transaction boundaries through the series of transformations from the source to the target;
- performing said series of transformations based on the one or more data sets thereby producing a multiplicity of results from said series of transformations; and
- completing the series of transformations by synchronizing the transaction boundaries and combining said multiplicity of results.

Kori, Miller, and Agrawal, alone or in the combinations suggested by the Examiner, do not disclose or suggest these aspects of the claimed invention. Contrary to the Examiner's assertions, Kori does not disclose or suggest "*processing via database transformation[s]*" or "*performing said series of transformations...thereby producing a multiplicity of results*" nor "*completing the processing/transformations...by synchronizing the transaction boundaries and combining said multiplicity of results.*" The sections of Kori cited by the Examiner for these elements (col. 5, ll. 17-52) merely describe transposing fields within a file. See col. 5, ll. 52-53. Kori does not disclose processing/transformations ***producing a multiplicity of results***, nor ***combining*** those results. Kori's sorting/transposing of fields produces no results whatsoever – only the fields themselves in a different order. As the Examiner correctly notes, Kori also does not disclose ***synchronizing transaction boundaries***.

Miller does not remedy these shortcomings. Miller pertains to tracking data when a membership change occurs in a cluster of computer systems to prevent the need to keep data history logs. See, e.g., Abstract; p. 1, para. [0008] – [0009]. Contrary to the Examiner's assertions, Miller does not disclose or suggest ***synchronizing transaction boundaries***. Rather,

in the cited section, Miller merely describes use of a history log with *a timestamp* that is synchronized *across computer systems* within a cluster. *See* p. 3, para. [0035]. Nor does Miller remedy any of the other above-referenced shortcomings of Kori.

The deficient disclosures of these references, considered either alone or in the combination suggested by the Examiner, thus fail to establish even a *prima facie* basis from which a proper determination of obviousness under 35 U.S.C. § 103(a) can be made. A *prima facie* showing of obviousness requires (1) some suggestion or motivation to modify the reference, (2) a reasonable expectation of success, and (3) that the reference(s) teach or suggest all the claim limitations. As discussed above, the references do not teach or suggest all of the claimed limitations. Thus, Applicants submit that claims 1, 12, 26, 37, 53, and 54 are patentably distinguishable over the cited references for at least this reason.

Furthermore, Applicants submit that the *even assuming arguendo* that the combination did show these claimed elements, the Examiner's arguments lack the necessary suggestion or motivation to modify the reference(s). Specifically, one of skill in the art would not be motivated to modify Kori to include various aspects of Miller as suggested by the Examiner. It is well understood in the art that data processing and file management (class 707) is entirely distinct from multicomputer data transferring (class 709), as reflected by the different USCL classifications into which Kori (707) and Miller (709) are placed. Thus, Applicants submit that claims 1, 12, 26, 37, 53, and 54 are patentably distinguishable over the cited reference for at least this additional reason.

Claims 2-11, 13-25, 27-36, and 38-50 respectively depend from claims 1, 12, 26, and 37, which were shown above to be patentable over the cited references. In addition, these

claims recite additional features not shown in the cited references. For these reasons, Applicants submit that claims 2-11, 13-25, 27-36, and 38-50 also are patentably distinguishable over the cited references. Claims 51 and 52 are canceled.

The Examiner also cites Agrawal in combination with Kori and Miller for dependent claims 8-10, 19-21, 33-35, and 44-46. However, Agrawal fails to remedy the above shortcomings of Kori and Miller, nor does the Examiner assert that it does. Thus, Applicants submit that claims 8-10, 19-21, 33-35, and 44-46 also are patenably distinguishable over the combination of Kori, Miller, and Agrawal.

### **Conclusion**

In sum, Applicants respectfully submit that claims 1-50, 53, and 54, as presented herein, are patentably distinguishable over the cited references. Therefore, Applicants request reconsideration of the basis for the rejections to these claims and request allowance of them.

In addition, Applicants respectfully invite the Examiner to contact Applicants' representative at the number provided below if the Examiner believes it will help expedite furtherance of this application.

Respectfully Submitted,

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